

June 28, 2017

MEMORANDUM

Subject: Contract EP-C-15-012, Work Assignment 2-94
Providing LOE to contractor at Work Assignment initiation

From: Bruce Suchomel, Work Assignment Contracting Officer Representative

Thru: Nancy Parrotta, Project Officer

To: Noelle Mills, Contracting Officer

Contract Clause EPAAR 1552.211-74, "Work Assignments" provides the contractor with information on the WA process and the content that will be provided in an awarded WA document issued by the CO under cost-reimbursement contracts. In November 2009, deviation was issued to the prescription for EPAAR 1552.21-74, which stated that when the WA is issued, the IGCE LOE should not be released to the contractor. However, in cases where the uncertainties involved in the effort are of such magnitude that there is no reasonable expectation that the contractor can estimate the level of effort required by the tasks, objectives, or outcomes of the requirement, the CO may provide a ceiling level of effort for the entire work assignment at the time of its issuance.

In this instance, it is necessary for the contractor to be provided with the LOE for the subject. This work assignment supports the EPA's organizing of Dewey-Burdock's public comments. As such, there are several uncertainties inherent to this type of work, particularly the amount of time needed to categorize the public comments. For example, categorizing the comments and organizing them into one document may require the addition of categories as the project continues, which will entail inserting/reorganizing the document. For this reason, there is no reasonable expectation that the contractor could accurately estimate the level of effort required. To assist the contractor in determining the necessary level of effort, we recommend the contractor be provided the Government's LOE estimate. The Government's estimate will be used as the basis for the contractor's resource projection.

The labor hours estimated for this effort, as shown in the IGCE, is 460.